

March 14, 2022

The Honorable Martin J. Oberman, Chairman
U.S. Surface Transportation Board
395 E Street SW
Washington, DC 20423

Dear Chairman Oberman:

We write to share our concerns about how the proposed rule on reciprocal switching (EP 711-1) would be harmful to communities, businesses and the environment in the state of Washington.

Washington relies more on the movement of goods than almost every other state, with 75 ports and nearly 20% of its economy tied to international trade. The 30 railroads and nearly 3,000 miles of railroad tracks across Washington are critical corridors for freight and passengers, making our manufacturers, producers and communities more prosperous through efficient and affordable service.

We have learned that the Surface Transportation Board is considering a new rule regarding rail reciprocal switching and wanted to state our opposition to the new policy, which we believe will adversely impact Washington's rail network and long-term transportation goals. The proposed rule at its core is mandated inefficiency—a practice that may benefit a few shippers in the short term but challenge the efficiency and long-term health of the rail network for the majority. Washington shippers want to move the most freight they can in the most efficient way they can—and our state leaders and citizens also want freight to emit the fewest emissions possible utilizing non-taxpayer funded railways, if possible.

Indeed, Washington has six transportation system goals, including promoting economic vitality, safety, mobility, energy conservation and an efficient system. The rule, if taken up, would undermine each of these goals. Slowdowns caused by more switching would disadvantage shippers and drive them toward over-the-road trucking. This would lead to more emissions, less efficient infrastructure, more congestion on taxpayer-funded roads, and fewer transportation options for shippers.

Many groups concur that the proposed rule could impair rail operations and diminish investment in the future. Washington has three intercity passenger rail routes—the Empire Builder, Coast Starlight and Amtrak Cascades—that could potentially face disruption from mandated switching. The Intermodal Association of North America opposes the policy for its potential to slow network velocity and undermine domestic intermodal service. For a state so tied to international trade, the future of intermodal is a critical consideration.

Washington is also a leader in sustainability and addressing climate change. A clear externality of the proposed rule is that it would result in more emissions, both from less efficient rail operations and from the resulting push to use more carbon-intensive modes. Railroads, which

account for 40% of U.S. long-distance freight but less than 2% of all transportation-related emissions, will be a critical tool to meet future demand in a way that meets our climate goals.

Railroads continue to invest at high levels into the tracks that drive economic development in communities across Washington. Countless jobs rely on this investment and healthy rail lines. We urge you to preserve our robust rail connections and discard the proposed rule.

Sincerely,

Verlyn Best
President and CEO
Greater Yakima Chamber of Commerce

Lora Butterfield
President and CEO
Fife Milton Edgewood Chamber of Comm.

Tara Doyle-Enneking
President and CEO
Puyallup-Sumner Chamber of Commerce

Chris Gildon
State Senator, District 25
Washington State Legislature

Kyle Hardtke
CEO
Amazing Landscapes

Andrea H. Reay
President and CEO
Seattle Southside Chamber of Commerce

David Schaffert
President and CEO
Thurston County Chamber of Commerce

CC: Members of the Washington Congressional Delegation